

R. Adam Swick
John. H. Thompson
Joanne Gelfand
AKERMAN LLP
1251 Avenue of the Americas, 37th Floor
New York, New York 10020
Tel. No. (212) 880-3800
Fax No. (212) 880-8965

Counsel to Ed Bolton

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC. *et al.*,

Debtors.

Chapter 11

Case No. 22-10943 (MEW)
(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Sections 102(1) and 1109(b) of title 11 of the United States Code (the "Bankruptcy Code"), the law firm of Akerman LLP hereby enters their appearance in the above-referenced Chapter 11 cases to represent Ed Bolton and hereby request that all notices given or required in these Chapter 11 Cases, and all documents, and all other papers served in the Chapter 11 Cases, be given to and served upon the undersigned counsel listed below:

R. Adam Swick
John H. Thompson
Joanne Gelfand
AKERMAN LLP
1251 Avenue of the Americas,
37th Floor
New York, New York 10020
Tel. No. 212.880.3800

Fax No. 212.880.8965
adam.swick@akerman.com
john.thomspn@akerman.com
joanne.gelfand@akerman.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the provisions of the Bankruptcy Code and Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronically or otherwise, which affects or pertains to the Debtors, the property of the Debtors or their Chapter 11 estates.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim or suit shall waive Ed Bolton's rights (1) to have final orders in non-core matters entered only after *de novo* review by a United States District Court, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have a United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, defenses, setoffs or recoupments to which Ed Bolton is, or may be, entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that the undersigned attorneys respectfully request that they be added to the official service list for notice of all contested matters, adversary proceedings and other proceedings in the Chapter 11 Cases.

Dated: September 1, 2022
New York, New York

/s/ R. Adam Swick

R. Adam Swick
John H. Thompson
Joanne Gelfand

AKERMAN LLP

1251 Avenue of the Americas,
37th Floor

New York, New York 10020

Tel. No. 212.880.3800

Fax No. 212.880.8965

E-Mail: adam.swick@akerman.com
john.thompson@akerman.com
joanne.gelfand@akerman.com

Counsel to Ed Bolton